

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**PLAINTIFF SINGULAR COMPUTING LLC’S MOTION TO COMPEL**

Plaintiff Singular Computing LLC (“Singular”) hereby moves to compel Google LLC to (1) produce complete responses to Singular’s interrogatory nos. 12-15, and 18-20, and (2) full production of documents responsive to requests for production nos. 39, 43, 44, 47-49, 82, and 87. Singular submits the accompanying Memorandum of Law in Support of its Motion to Compel.

As set forth in Singular’s Memorandum of Law, the discovery that Singular seeks from Google is relevant to material facts at issue in this litigation and Google has no justifiable reason for not providing the documents and information Singular seeks. For these reasons, as set forth more fully in the accompanying Memorandum of Law, Singular respectfully requests that this Honorable Court:

1. Order Google to produce complete responses to Singular’s interrogatory nos. 12-15, and 18-20.
2. Order Google to produce full production of all documents responsive to Plaintiff’s Request for Production Nos. 39, 43, 44, 47-49, 82, and 87.

Dated: May 18, 2021

Respectfully submitted,

/s/ Paul Hayes

Paul J. Hayes (BBO #227000)

Matthew D. Vella (BBO #660171)

Kevin Gannon (BBO #640931)

Daniel McGonagle (BBO #690084)

Brian M. Seeve (BBO #670455)

**PRINCE LOBEL TYE LLP**

One International Place, Suite 3700

Boston, MA 02110

Tel: (617) 456-8000

Fax: (617) 456-8100

Email: phayes@princelobel.com

Email: mvella@princelobel.com

Email: kgannon@princelobel.com

Email: dmcgonagle@princelobel.com

Email: bseeve@princelobel.com

ATTORNEYS FOR THE PLAINTIFF

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I, Paul Hayes, counsel for Plaintiff, hereby certifies that Plaintiff's counsel attempted to confer with counsel for Defendant, Google LLC, in a good-faith attempt to resolve or narrow the issues raised by this motion. Counsel for Defendant refused to meet and confer regarding these issues and instead objected to holding a meet and confer until they had substantial time to review Plaintiff's supplemental discovery responses. The attempts to conference this motion are detailed in the supporting memorandum.

/s/ Paul Hayes

Paul Hayes

**LOCAL RULE 37.1(b) CERTIFICATION**

I, Paul Hayes, counsel for Plaintiff, hereby certify that Plaintiff's counsel made a good-faith effort to comply with the provisions of Rule 37.1.

/s/ Paul Hayes

Paul Hayes

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Paul Hayes